

Fact Sheet



For Final Minor Modification Permitting Actions Under 45CSR30 and Title V of the Clean Air Act

This Fact Sheet serves to address the changes specific to these Minor Modifications, and shall be considered a supplement to the Fact Sheet corresponding with the Title V operating permit issued on April 19, 2010.

Permit Number: **R30-10700001-2010**

Applications Received: **July 29, 2014**

Plant Identification Number: **107-00001**

Permittee: **E. I. du Pont de Nemours and Company**

Facility Name: **Washington Works**

Manufacturing Unit: **Polyvinyl Butyral Production (Part 4 of 14)**

Mailing Address: **P. O. Box 1217, Washington, WV 26181-1217**

Permit Action Number: MM01 and MM02 Revised: October 15, 2014

Physical Location:	Washington, Wood County, West Virginia
UTM Coordinates:	422.27 km Easting • 4,346.57 km Northing • Zone 17
Directions:	Route 68 west from Parkersburg to intersection of Route 892. Continue west on Route 892 with the plant being on the north side about one mile from the intersection of Routes 68 and 892.

Facility Description

In the Polyvinyl Butyral Production Unit (Part 4 of 14), polyvinyl butyral (PVB) resin particles and sheeting are manufactured for use in automotive and architectural laminated glass applications. The Polyvinyl Butyral Production Unit has the capability to operate 8,760 hours per year.

Butyraldehyde, one of the two main raw materials, is received by tank car and stored in tanks. The other major raw material, polyvinyl alcohol (PVA) is received by hopper cars and stored in silos. The PVA is then weighed, dissolved in water, and placed in a holdup tank. Butyraldehyde and PVA are fed to reactors where they form polyvinyl butyral (PVB). The polyvinyl butyral, in an aqueous slurry form, is then transferred to either the flake drying or extrusion areas. The PVB that is sent to the flake drying area is dewatered, dried, and then stored in a silo before being loaded for shipment off-site.

SIC Codes: 2819, 2821, 2824.

Emissions Summary

There are no changes in emissions as a result of these modifications.

Title V Program Applicability Basis

With the proposed changes associated with these modifications of the Polyvinyl Butyral Production Permit, this facility as a whole maintains the potential to emit over 100 tons per year of criteria pollutants, over 10 tons per year of an individual HAP, and over 25 tons per year of aggregated HAPs. DuPont Washington Works is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 45CSR30.

Legal and Factual Basis for Permit Conditions

The State and Federally-enforceable conditions of the Title V Operating Permits are based upon the requirements of the State of West Virginia Operating Permit Rule 45CSR30 for the purposes of Title V of the Federal Clean Air Act and the underlying applicable requirements in other state and federal rules.

The modification to this facility has been found to be subject to the following applicable rules:

Federal and State:	45CSR13	Permits for construction, modification, relocation, etc.
	45CSR30	Operating permit requirement.
State Only:	45CSR §§21-37, 40	VOC Emissions

Each State and Federally-enforceable condition of the draft Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the draft Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the draft Title V permit as such.

The Secretary's authority to require standards under 40 C.F.R. Part 60 (NSPS), 40 C.F.R. Part 61 (NESHAPs), and 40 C.F.R. Part 63 (NESHAPs MACT) is provided in West Virginia Code §§ 22-5-1 *et seq.*, 45CSR16, 45CSR34 and 45CSR30.

Active Permits/Consent Orders

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit (<i>if any</i>)
R13-2380E	August 11, 2014	

Conditions from this facility's Rule 13 permit(s) governing construction-related specifications and timing requirements will not be included in the Title V Operating Permit but will remain independently enforceable under the applicable Rule 13 permit(s). All other conditions from this facility's Rule 13 permit(s) governing the source's operation and compliance have been incorporated into this Title V permit in accordance with the "General Requirement Comparison Table B, which may be downloaded from DAQ's website.

Determinations and Justifications

Permit R13-2617F was intended to provide the applicable conditions and requirements of Rules 21 and 27 Facility-wide. The Permittee intends on selling the Butacite GLS process to another company. Class I administrative update R13-2617G removed the equipment in the Butacite GLS process from the R13-2617F Permit so those requirements could be added to the R13-2380E Permit. This will allow the Butacite GLS process to be covered under one Permit (R13-2380E) and transferred during the sale of the Butacite GLS process.

The sources removed from R13-2617F and added to R13-2380E are eight (8) Condensation Reactors. They were referred to as B8-1 through B8-8 in R13-2617F Attachment A. The Attachment also listed applicable 40CFR63, Subpart FFFF NESHAP for Miscellaneous Organic Chemical Manufacturing which was already contained in the R13-2380E Permit.

MM01 changes due to R13-2617G

Appendix B: R13-2617C Attachment has been removed from this Permit. Also Conditions 3.1.9 through 3.1.12, 3.2.1 through 3.2.3, 3.3.2, 3.3.3, 3.4.6, 3.4.7, and 3.5.11 have been removed from the permit.

MM02 changes due to R13-2380E

Appendix A has changed references from R13-2380D to R13-2380E.

Condition 4.1.3 which references R13-2617C has been removed from the Permit. The other conditions of Section 4.0 have been renumbered accordingly.

R13-2380E citations have been updated as necessary.

The D in R13-2380D has been removed from Conditions 3.5.10 and 4.5.1.

Section 6.0 "Rule 21 Requirements" has been added to this Permit. It contains the Rule 21 requirements for the eight (8) Condensation Reactors B8-1 through B8-8. These Conditions come from Section 5.0 of R13-2380E and R13-2617F.

Non-Applicability Determinations

The following requirements have been determined not to be applicable to the subject facility due to the following:
None

Request for Variances or Alternatives

None

Insignificant Activities

Insignificant emission unit(s) and activities are identified in the Title V application.

Comment Period

Beginning Date: N/A

Ending Date: N/A

All written comments should be addressed to the following individual and office:

Michael Egnor
Engineer
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE

Charleston, WV 25304

Procedure for Requesting Public Hearing

During the public comment period, any interested person may submit written comments on the draft permit and may request a public hearing, if no public hearing has already been scheduled. A request for public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing. The Secretary shall grant such a request for a hearing if he/she concludes that a public hearing is appropriate. Any public hearing shall be held in the general area in which the facility is located.

Point of Contact

Michael Egnor
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone: 304/926-0499 ext. 1208 • Fax: 304/926-0478

Response to Comments (Statement of Basis)

None